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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent application of:	) Attorney Docket No.: E-924
Gerald L. Taylor	) Group Art Unit: 3629
Serial No.: 09/468,470	) Examiner: Richard Sukyoon Woo
Filed: December 21, 1999	) Date: 9 July 2003
Confirmation No.: 3675	) Customer No.: 00919

Title: **METHOD AND PROCESS FOR PROVIDING POSTAL DISCOUNTING**

APPELLANT'S BRIEF

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

This Brief is in furtherance of the Notice of Appeal filed in this case on May 27, 2003.

This Brief is transmitted in triplicate.

TABLE OF CONTENTS

This Brief contains these items under the following headings and in the order set forth below.

I. REAL PARTY IN INTEREST

Pitney Bowes Inc. is the real party in interest.

II. RELATED APPEALS AND INTERFERENCES

There are no related Appeals and interferences

III. STATUS OF CLAIMS

a) Claims 1 - 14 are in the application.

b) Claims 1 - 14 are rejected

d) Claims 1 - 14 are on appeal

IV. STATUS OF AMENDMENTS

An Amendment subsequent to the Final Rejection of February 27, 2003, was filed on April 23, 2003. This Amendment was entered.

V. SUMMARY OF THE INVENTION

A. Background

The prior art did not disclose a method for providing postal discounting to a mailer in accordance with the DDU discounts without requiring the mailer to look up and verify the local ZIP codes for all the relevant eligible entry points and code the required parameters to specify the local ZIP codes.

Most companies throughout the United States use the services of the United States Postal Service (USPS) to communicate with their customers. These companies use the USPS to deliver monthly bills, monthly statements, annual reports for

shareholders, catalogs for holiday shopping, newspapers, monthly magazine subscriptions, and Standard Mail (A) direct mail.

The cost associated with moving mail from the sender to the recipient is related primarily to the manual effort involved. The mail must go through several sorting processes and eventually be sorted down to the carrier delivering the mail. Once the mail is sorted down to the actual mail carrier, the carrier must manually sort the mail into the sequence that matches the route that he/she walks or drives. This is a very expensive, labor-intensive process. Carriers spend approximately fifty percent (50%) of their time manually sorting mail.

The USPS has spent billions of dollars to automate this process. The intent of automation is to process the mail faster while minimizing costs. To minimize costs, automated equipment has been manufactured and data processing methods have been implemented. The data processing methods were created so that the mailers themselves could perform certain tasks that would make it easier for the USPS to process the mail. The USPS passes the labor savings on to any mailer who shares in the work in the form of postage discounts. This is known as "work sharing." There are a number of tasks that a mailer can perform to obtain work sharing discounts. The more work the mailer performs, the greater the discounts.

The oldest work sharing program is carrier route sorting. Mailers match their name and address mailing file to the USPS postal data and assign carrier route codes. Every ZIP code and/or city is broken up into carrier routes. Each route represents one mail carrier. The USPS assigns each carrier a carrier number. This number is the carrier route code.

The Domestic Mail Manual (DMM) published by the United States Postal Service describes various methods for presorting to accommodate the different classes and mail piece characteristics. In particular, a discount is available for mailing Periodicals and Standard Mail (A) if the mail is properly prepared and entered by the mailer at an

eligible USPS entry postal facility that serves the delivery address on the mail. This discount category is referred to as Destination Delivery Unit (DDU) rate or discounting.

In order to take advantage of DDU discounts, the mailer must determine the eligible USPS entry postal facilities and their ZIP codes and identify all the local ZIP codes of the delivery addresses being served by each eligible USPS entry postal facility. When mailing, the mailer must code in the three-digit ZIP code prefix or the five-digit code for the entry postal facility, and then code in a parameter to specifying all the local ZIP codes that are served by the entry postal facility and eligible for the DDU rate. For example, for the eligible entry postal facility at Aurora, IL, the five-digit code is 60506, while the three-digit ZIP code prefix is 605.

The USPS Address Information System presently puts out a number of products to help mailers who wish to take advantage of DDU discounts. The products relevant for DDU discounts are the USPS Drop Ship Address File and the USPS Drop Ship ZIP Carrier Route File, which are part of the USPS Drop Ship Product. The USPS Drop Ship Address File contains the USPS facility address and telephone information, and a drop site key for linking the entry postal facility address to the ZIP code of the delivery address. The USPS Drop Ship ZIP Carrier Route File contains ZIP codes, carrier routes and other discount codes. It also contains a drop site letter key and a drop site other key or additional discounts. The keys are pointers for connecting the USPS Drop Ship Address File to the USPS Drop Ship ZIP Carrier Route File.

Identifying all the local ZIP codes for an entry point that are eligible for the DDU rate and manually coding in the parameter to identify these ZIP codes is time-consuming and subject to errors. Furthermore, the USPS updates the Drop Ship Address File and the Drop Ship ZIP Carrier Route File monthly. In order to incorporate the ZIP code changes to comply with USPS monthly updates, the mailer has to verify the list of ZIP codes associated with each eligible entry point every time the mailer runs the mailing.

Thus, a problem of the prior art was no method for providing postal discounting to a mailer in accordance with the DDU discounts without requiring the mailer to look up and verify the local ZIP codes for all the relevant eligible entry points and code the required parameters to specify the local ZIP codes.

B. Appellant claims a method that allows a mailer to receive postal discounting in accordance with the Postal DDU discounts without requiring the mailer to look up and verify the local ZIP codes for all the relevant eligible entry points and code the required parameters to specify the local ZIP codes.

The method, according to the present invention, allows a mailer to receive postal discounts for mailing a plurality of mail pieces to a plurality of mailing addresses at a postal entry point, wherein the postal discounts are provided in accordance with the USPS Destination Delivery Unit (DDU) rates or discounts for mailing Periodicals, Standard Mail (A) and Standard Mail (B) at a plurality of eligible USPS postal facilities. Each of the eligible USPS postal facilities is associated with a plurality of local ZIP codes and carrier routes. The method comprises the steps of: a) creating an entry point lookup file containing a plurality of identification codes, each of which identifies one eligible USPS postal facility so as to allow the mailer to use one of the identification codes to identify the postal entry point where the mailer drops off the mail for mailing; b) creating a drop ship index file containing a plurality of local ZIP codes and carrier routes associated with each eligible USPS postal facility; and c) checking the mailing address of each mail piece to verify whether the mailing address is contained in the plurality of local ZIP codes and carrier routes associated with said postal entry point.

The method, according to the present invention, uses the USPS Drop Ship Address file to create the entry point lookup file and the USPS Drop Ship ZIP Carrier Route File to create the drop ship index file.

Preferably, the identification code is a nine-digit code. With the method according to the present invention, all the mailer has to do is code a special parameter with the nine-digit identification code for the postal entry point. For example, the special parameter is called SPLTENTRY that is used to prompt the user to enter the identification code.

The process of creating the entry point lookup file and the drop ship index file comprises the steps of: a) providing a USPS Drop Ship Address File; b) retrieving the USPS facility addresses contained in the USPS Drop Ship Address File; c) creating a nine-digit identification code for each of said USPS facility addresses; d) sorting the identification codes by the drop site key; e) providing a USPS Drop Ship ZIP Carrier Route File; f) retrieving the local ZIP codes, carrier routes and other discount codes from the USPS Drop Ship ZIP Carrier Route File; g) sorting the local ZIP codes, carrier routes and other discount codes by the drop site letter key; and h) merging the identification codes with the local ZIP codes, carrier routes and other discount codes, wherein when a mailer codes the SPLTENTRY parameter with an identification code for a postal entry point, the local ZIP codes, carrier routes and other discount codes associated with the postal entry point are extracted in accordance with the drop site key, the drop site letter key and the drop site other key, thereby determining the availability of the DDU discounts for the mailing address on each mail piece.

The method according to the present invention is described in Fig. 3 of the specification.

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        ●                    ●

    ┌─────────────────────┐
    │      Provide        │
    │    a mailer's list  │
    │         of          │
    │  Mailing addresses  │── 100
    └─────────────────────┘
              │
              ▼
    ┌─────────────────────┐
    │      Identify       │
    │  the drop ship entry│
    │    point from the   │
    │   Entry Look up File │── 110
    └─────────────────────┘
              │
              ▼
    ┌─────────────────────┐
    │       Code          │
    │  The SPLTENTRY Para. │── 120
    │       w/ the        │
    │  drop ship entry point│
    │        code         │
    └─────────────────────┘
              │
              ▼
    ┌─────────────────────┐
    │     Retrieve        │
    │  a list of local ZIP │── 130
    │   codes associated w/│
    │  the drop ship entry │
    │     point code      │
    └─────────────────────┘
              │
              ▼
    ┌─────────────────────┐
    │     Compare         │
    │  the mailer's mailing│
    │  addresses with the  │── 140
    │  local ZIP codes to  │
    │ determine the eligibility│
    │   of DDU discounts  │
    └─────────────────────┘
```
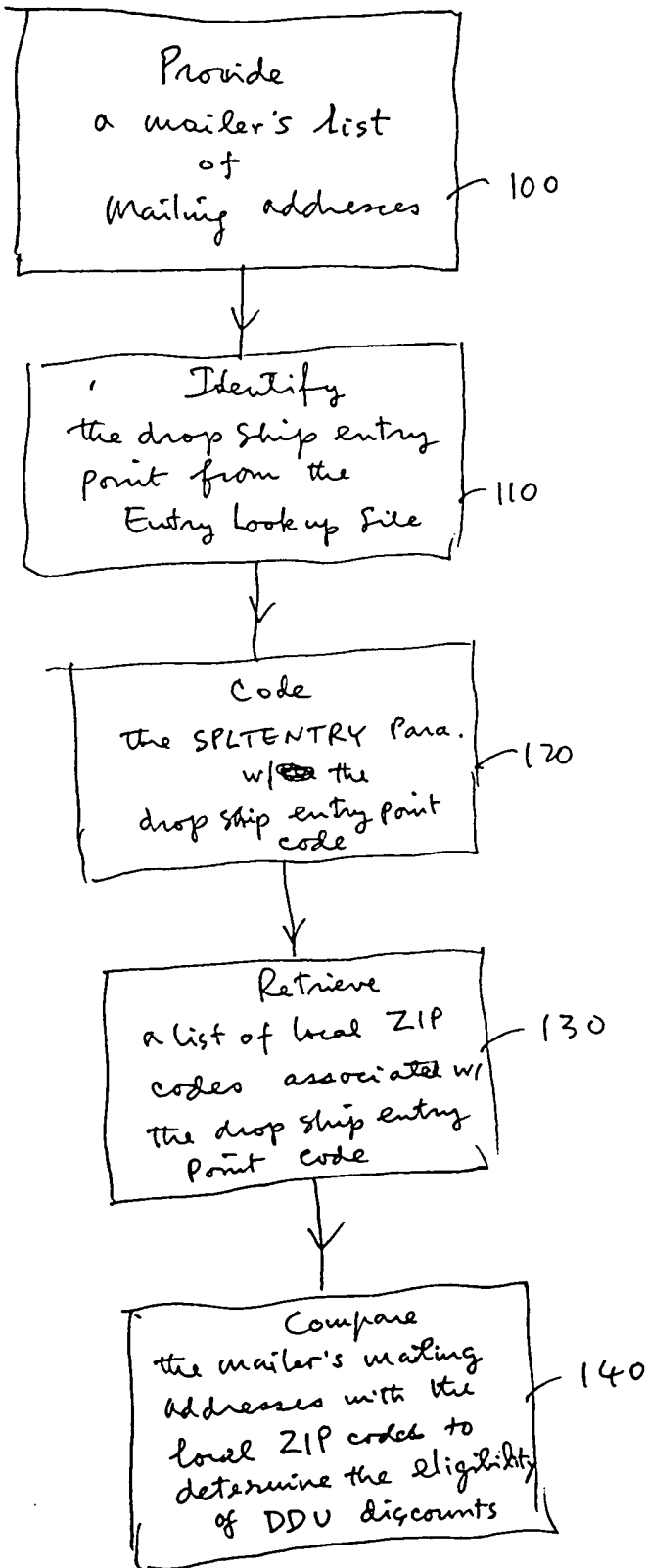
Fig 2

Figure 3 shows the procedure flow of using the identification code by a mailer in order to receive the DDU discounts. To take advantage of the present invention, the mailer provides a list of mailing addresses for mailing, as shown at block 100. From the entry point lookup file, which sequentially lists the addresses of the USPS entry postal facilities eligible for DDU discounts, as shown at block 110, the mailer finds the identification code for the Post Office to which he/she wants to drop ship to obtain DDU discounts and the associated identification code, and the mailer codes the SPLTENTRY parameter with the nine-digit identification code, as shown at block 120. According to the entered identification code, the carrier route and ZIP code for each of the mailing addresses found in the drop ship index file is retrieved, as shown at block 130. Each of the retrieve carrier routes and ZIP codes is then checked to determine whether a DDU rate is applicable. If the DDU rate is applicable, the postal facility, which is equal to what the user specified via the unique nine-digit identification, is checked to determine whether it is associated with the carrier route that was found. If the carrier route is indeed associated with the postal facility chosen by the user for DDU, a DDU discount is given, as shown at block 140.

VI. ISSUES PRESENTED FOR REVIEW

A. Whether or not claims 1 - 3 are patentable under 35 U.S.C. §102(b) for being anticipated by Brust et al., U.S. Patent No. 5,673,193.

B. Whether or not claims 4 - 7 are patentable under 35 U.S.C. §103 (a) over Burst, et al. (U.S. Patent No. 5,673,193) and further in view of Manduley, et al. (U.S. Patent No. 5,079,714).

C. Whether or not claim 8 is patentable under 35 U.S.C. §103 (a) over Burst, et al. (U.S. Patent No. 5,673,193) and further in view of Manduley, et al. (U.S. Patent No. 5,079,714).

D.   Whether or not claims 9- 12 are patentable under 35 U.S.C. §103 (a) over Burst, et al. (U.S. Patent No. 5,673,193) and further in view of Manduley, et al. (U.S. Patent No. 5,079,714).

E.   Whether or not claims 13 and 14 are patentable under 35 U.S.C. §103 (a) over Burst, et al. (U.S. Patent No. 5,673,193) and further in view of Manduley, et al. (U.S. Patent No. 5,079,714).

VII.   GROUPING OF CLAIMS

A. Claims 1-3 stand or fall together with regard to the rejection under 35 U.S.C. §102(b).

B. Claims 4 - 7 stand or fall together with regard to the rejection under 35 U.S.C. §103(a).

C. Claim 8 stands or falls with regard to the rejection under 35 U.S.C. §103(a).

D. Claims 9 - 12 stand or fall together with regard to the rejection under 35 U.S.C. §103(a).

E. Claims 13 and 14 stand or fall together with regard to the rejection under 35 U.S.C. §103(a).

VIII.   ARGUMENTS

A.   Claims 1 - 3 have been rejected by the Examiner under U.S.C. §102(b) for being anticipated by Brust et al., U.S. Patent No. 5,673,193.

The Examiner indicated in pages 2 and 3 of the Final Rejection that: step a of claim 1 is disclosed in column 2 lines 34 –37, step b of claim 1 is disclosed in column 2 lines 28 – 34 and step c of claim 1 is disclosed in column 2 lines 37 – 43.

Brust discloses the following in lines 27-43 of column 2:

"The invention comprises a system and method for processing a mailing consisting of a plurality of identical printed items to be grouped into bundles having an identical general address. Information as to bulk mailing centers (BMC) is accessed, which information provides an associated BMC for each group of zip codes, based generally on geographical proximity to a certain BMC. Information as to postal zones and rates to a particular zip code from the BMCs is also accessed, so that postal rates for each bundle can be calculated. Addressee information is provided to the system, including a general address having a zip code and particularized information for each addressee. The addresses should preferably be compatible with the particular bulk mailing procedures being used. Alternatively, the addresses can be screened for compatibility after being input into the system."

Steps a, b and c of claim 1 read as follows:

a) creating an eligible entry DDU site lookup file containing a plurality of identification codes, each of which identifies one eligible DDU USPS postal facility so as to allow the mailer to use one of the identification codes to identify the postal entry point where the mailer drops off the mail pieces for mailing;

b) creating a drop ship index file containing a plurality of local ZIP codes and carrier routes associated with each eligible USPS postal facility; and

c) checking the mailing address of each mail piece in order to verify whether the mailing address is contained in the plurality of local ZIP codes and carrier routes associated with said postal entry point.

Brust's invention deals with bulk mailing centers (BMC) and Burst does not disclose or anticipate steps a, b and c of claim 1. The United States Postal Service defines a BMC as a highly mechanized mail processing plant that distributes standard mail and package services in piece and bulk form. The BMC are major postal facilities

that also act as distribution hubs for transporting mail to destination delivery units. There are only 21 BMC in the United States and approximately 36,000 destination delivery units in the United States. The invention claimed by Appellant in claims 1-3 begins where Brust left off.

In Burst's invention, a mailer would have to deliver their mail to one of 21 BMC's that is located in the United States. Thus, it is probable that the mailer would have to travel a great distance to deliver their mail to the closest BMC. In Appellant's claimed invention, the mailer would identify eligible DDU USPS postal facility where the mailer may drop off their mail for mailing. This postal facility would be much closer to the mailer than the closest BMC facility. Thus, the mailer would not have to travel as far to deposit their mail with the U.S. Postal Service. Hence, an advantage of Appellant's claimed invention is that a mailer would save time and money by delivering their mail to an eligible DDU.

B.   Claims 4 - 7 have been rejected by the Examiner under U.S.C. §103(a) over Burst, et al. (U.S. Patent No. 5,673,193) and further in view of Manduley, et al. (U.S. Patent No. 5,079,714).

Burst has been discussed above in Section A.

The Examiner indicated in pages 4 and 5 of the Final Rejection that claim 4 is disclosed in column 4 lines 44 –46 of Manduley; claim 5 is disclosed in column 4 lines 27 – 31 of Manduley; and claim 6 is disclosed in column 4 lines 44 – 46 of Manduley.

> Manduley discloses the following in lines 12-55 of column 4:
> "After a mail piece leaves the counter and comparator 18, it will be transported to a scale 26 which is in electrical communication with the microcomputer 20. The scale should be of a type that is able to weigh a mail piece rapidly and accurately. An example of such a scale is shown and described in U.S. Pat. No. 4,778,018, which is assigned to the assignee of the instant patent application. After the weight is obtained, the weight is transmitted to the microcomputer 20 and the

mail is then forwarded to a scanner 28. The latter will identify and ready the last line of the address block, which gives the city, state and zip code, and measure certain parameters of the mail piece such as print contrast, surface reflectivity, and print font style. The scanner 28 in combination with the microcomputer 20 will perform a number of functions. Firstly, the geographical distribution of the mail will be determined. This will allow the Post Office to be aware of which regional centers the mail is to be sent. The combination will also determine the accuracy of the zip or the zip + 4 addressing. The lettering used to address the mail piece will be determined, i.e. the type of font used. This is useful information to the Post Office since some OCR machines are more capable of reading one type of font as opposed to a different type. The readability of the mailing address will be determined based upon the contrast and reflectivity of the mail pieces. This information will be sent to the microcomputer and stored in memory. The mail pieces will then be passed on to the transport controller whereby the mail pieces eventually will join the batch mail 12, being replaced in their original position. While such transporting is going on, certain activities are undertaken by microprocessor. The zip codes that are determined from the mail will be compared against the national zip + 4 data base and retrieved. If the zip code is not found, an indication as such is stored as undeliverable for bad zip code. In the alternative, one can compare the zip coded city and state to the written city and state address, and if there are any mismatches, it is recorded as being undeliverable. If the mail is pre-barcoded, the bar code is decoded and compared to the zip code. If there is a mismatch, again it is marked as undeliverable. If manifest mail is being processed, an accuracy analysis is made of the manifest key line."

Claims 4 and 5 depend on claim 1; claim 6 depends on claim 5; and claim 7 depends on claim 6.

In claim 4, the identification code is a nine-digit code.

In claim 5, the identification code is a ZIP+4 code for an eligible USPS postal facility.

In claim 6, the identification code is a nine-digit code.

In claim 7, the nine-digit identification code is equivalent to a three-digit prefix or the five-digit ZIP code for an eligible USPS postal facility.

In addition to the arguments made in above Section A, the cited references do not disclose or anticipate a identification code that may be utilized to deliver their mail to a eligible DDU.

Notwithstanding the foregoing, in rejecting a claim under 35 U.S.C. §103, the Examiner is charged with the initial burden for providing a factual basis to support the obviousness conclusion. *In re Warner*, 379 F.2d 1011, 154 USPQ 173 (CCPA 1967); *in re Lunsford*, 375 F.2d 385, 148 USPQ 721 (CCPA 1966); *in re Freed*, 425 F.2d 785, 165 USPQ 570 (CCPA 1970). The Examiner is also required to explain how and why one having ordinary skill in the art would have been led to modify an applied reference and/or combine applied references to arrive at the claimed invention. *In re Ochiai*, 37 USPQ2d 1127 (Fed. Cir. 1995); *in re Deuel, 51 F.3d 1552, 34 USPQ 1210 (Fed. Cir. 1995); in re Fritch*, 972 F.2d 1260, 23 USPQ 1780 (Fed. Cir. 1992); *Uniroyal, Inc. v. Rudkin-Wiley Corp.*, 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988). In establishing the requisite motivation, it has been consistently held that both the suggestion and reasonable expectation of success must stem from the prior art itself, as a whole. *In re Ochiai*, supra; in re Vaeck, *947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991); in re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); *in re Dow Chemical Co.*, 837 F.2d 469, 5 USPQ2d 1529 (Fed. Cir. 1988).

C.   Claim 8 has been rejected by the Examiner under U.S.C. §103(a) under U.S.C. §103(a) over Burst, et al. (U.S. Patent No. 5,673,193) and further in view of Manduley, et al. (U.S. Patent No. 5,079,714).

Claim 8 depends on claim 1. In claim 8, each eligible USPS postal facility has an address including a state, a city and a street, the identification codes in the entry point lookup file being sorted according to the address of the eligible USPS postal facilities by state, city and street.

In addition to the arguments made in above Section A, the cited references do not disclose or anticipate sorting the identification codes in the entry point lookup file according to the address of the eligible USPS postal facilities by state, city and street.

D.   Claims 9 - 12 have been rejected by the Examiner under U.S.C. §103(a) over Burst, et al. (U.S. Patent No. 5,673,193) and further in view of Manduley, et al. (U.S. Patent No. 5,079,714).

In addition to the arguments made in above Section A, the cited references do not disclose or anticipate steps a, b, c and d of claim 9, namely,

a)   providing a USPS Drop Ship Address File, which contains a plurality of addresses of the eligible USPS postal facilities;

b)   retrieving the addresses of the eligible DDU USPS postal facilities, wherein each address contains a ZIP code, a state, a city and a street;

c)   creating the plurality of identification codes, each identification code for one eligible DDU USPS postal facility based on the address thereof; and

d)   sorting the plurality of identification codes according to the state, the city and the street of the eligible DDU USPS postal facilities.

E.   Claims 13 and 14 have been rejected by the Examiner under U.S.C. §103(a) over Burst, et al. (U.S. Patent No. 5,673,193) and further in view of Manduley, et al. (U.S. Patent No. 5,079,714).

In addition to the arguments made in above Section A, the cited references do not disclose or anticipate steps a, b, c and d of claim 13, namely,

a)   providing a USPS Drop Ship Address File, which contains a plurality of addresses of the eligible USPS postal facilities and a drop site key;

b)   retrieving the addresses of the eligible USPS postal facilities, wherein each address contains a ZIP code;

c)   sorting the retrieved addresses of the eligible USPS postal facilities by the drop site key;

d)   providing a USPS Drop Ship ZIP Carrier Route File which contains a plurality of local ZIP codes and carrier routes associated with the eligible DDU USPS postal facilities, a drop site letter key, and a drop site other key;

e)   retrieving from the USPS Drop Ship ZIP Carrier Route File the plurality of local ZIP codes and carrier routes eligible for DDU discounting, the drop site letter key, and the drop site other key;

f)   sorting the retrieved local ZIP codes and carrier routes by the drop site letter key;

g)   merging the retrieved addresses of the eligible USPS postal facilities as sorted in step (c) and the retrieved local ZIP codes and carrier routes as sorted in step (d);

h)   sorting the merged addresses and ZIP codes/carrier routes by the drop site other key; and

i)   creating a plurality of identification codes, each for one retrieved address of the eligible USPS postal facilities so that when the mailer uses an identification code to identify the eligible USPS postal facility where the mailer drops off the mail pieces for mailing, the local ZIP codes and carrier routes associated with said eligible USPS postal facility are used to check against each of the mailing addresses to determine whether said mailing address are available for DDU discounting.

The cited references do not disclose or anticipate check against each of the mailing addresses to determine whether said mailing address are available for DDU discounting.

IX PRAYER FOR RELIEF

Appellant respectfully submits that appealed claims 1 - 14 in this application are patentable. It is requested that the Board of Appeal overrule the Examiner and direct allowance of the rejected claims.

Respectfully submitted,

_____

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PITNEY BOWES INC. Intellectual Property and Technology Law Department 35 Waterview Drive P.O. Box 3000 Shelton, CT 06484-8000	<u>CERTIFICATE OF MAILING</u> I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to:

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On <u>July 9, 2003</u> Date of Deposit	<u>Esther A. Lapin</u> Name of Rep.
_____ Signature	<u>July 9, 2003</u> Date

APPENDIX OF CLAIMS

1.   A method to allow a mailer utilizing a data processing system to receive postal discounts for mailing at an eligible postal entry DDU site a plurality of mail pieces to a plurality of mailing addresses, wherein the postal discounts are provided in accordance with USPS Destination Delivery Unit (DDU) rate or discounting for mailing Periodicals and Standard Mail at a plurality of eligible USPS postal facilities, each eligible USPS postal facility associated with a plurality of local ZIP codes and carrier routes, said method comprising the steps of:

    a)   creating an eligible entry DDU site lookup file containing a plurality of identification codes, each of which identifies one eligible DDU USPS postal facility so as to allow the mailer to use one of the identification codes to identify the postal entry point where the mailer drops off the mail pieces for mailing;

    b)   creating a drop ship index file containing a plurality of local ZIP codes and carrier routes associated with each eligible USPS postal facility; and

    c)   checking the mailing address of each mail piece in order to verify whether the mailing address is contained in the plurality of local ZIP codes and carrier routes associated with said postal entry point.

2. (Original)   The method of claim 1, wherein the entry point lookup file is created from a USPS Drop Ship Address File which contains addresses of eligible USPS postal facilities.

3. (Original)   The method of claim 2, wherein the drop ship index file is created from a USPS Drop Ship ZIP Carrier Route File which contains local ZIP codes and carrier routes associated with each eligible USPS postal facility.

4. (Original)   The method of claim 1, wherein the identification code is a nine-digit code.

5. (Original)   The method of claim 1, wherein the identification code is a ZIP+4 code for an eligible USPS postal facility.

6. (Original)   The method of claim 5, wherein the identification code is a nine-digit code.

7. (Original)   The method of claim 6, wherein the nine-digit identification code is equivalent to a three-digit prefix or the five-digit ZIP code for an eligible USPS postal facility.

8. (Original)   The method of claim 1, wherein each eligible USPS postal facility has an address including a state, a city and a street, the identification codes in the entry point lookup file being sorted according to the address of the eligible USPS postal facilities by state, city and street.

9. (Previously Amended)   A process for creating an entry point lookup file containing a plurality of identification codes so as to allow a mailer to use one of the identification codes to identify an eligible USPS postal facility where the mailer drops off a plurality of mail pieces for mailing the mail pieces in order to receive postal discounts, wherein the postal discounts are provided in accordance with USPS Destination Delivery Unit (DDU) rate or discounting for mailing Periodicals and Standard Mail, said process comprising the steps of:

a)   providing a USPS Drop Ship Address File, which contains a plurality of addresses of the eligible USPS postal facilities;

b)   retrieving the addresses of the eligible DDU USPS postal facilities, wherein each address contains a ZIP code, a state, a city and a street;

c)   creating the plurality of identification codes, each identification code for one eligible DDU USPS postal facility based on the address thereof; and

d)   sorting the plurality of identification codes according to the state, the city and the street of the eligible DDU USPS postal facilities.

10. (Original)   The process of claim 9, wherein the identification codes are created based on the ZIP codes of the eligible USPS postal facilities.

11. (Original)   The process of claim 9 further comprising the step of checking the retrieved addresses of the eligible USPS postal facilities to make sure the addresses are accurate.

12. (Original)   The process of claim 9, wherein each identification code is a nine-digit code.

13. (Previously Amended) A process of creating a drop ship index file so as to allow a mailer to receive postal discounts for mailing at an eligible USPS postal facility a plurality of mail pieces to a plurality of mailing addresses, wherein the postal discounts are provided in accordance with USPS Destination Delivery Unit (DDU) rate or discounting for mailing Periodicals and Standard Mail at a plurality of eligible USPS postal facilities, wherein the drop ship index file contains a plurality of local ZIP codes and carrier routes associated with each eligible USPS postal facility, said process comprising the steps of:

a)   providing a USPS Drop Ship Address File, which contains a plurality of addresses of the eligible USPS postal facilities and a drop site key;

b)   retrieving the addresses of the eligible USPS postal facilities, wherein each address contains a ZIP code;

c)   sorting the retrieved addresses of the eligible USPS postal facilities by the drop site key;

d)   providing a USPS Drop Ship ZIP Carrier Route File which contains a plurality of local ZIP codes and carrier routes associated with the eligible DDU USPS postal facilities, a drop site letter key, and a drop site other key;

e)   retrieving from the USPS Drop Ship ZIP Carrier Route File the plurality of local ZIP codes and carrier routes eligible for DDU discounting, the drop site letter key, and the drop site other key;

f)   sorting the retrieved local ZIP codes and carrier routes by the drop site letter key;

g)   merging the retrieved addresses of the eligible USPS postal facilities as sorted in step (c) and the retrieved local ZIP codes and carrier routes as sorted in step (d);

h)   sorting the merged addresses and ZIP codes/carrier routes by the drop site other key;

i)   creating a plurality of identification codes, each for one retrieved address of the eligible USPS postal facilities so that when the mailer uses an identification code to identify the eligible USPS postal facility where the mailer drops off the mail pieces for mailing, the local ZIP codes and carrier routes associated with said eligible USPS postal facility are used to check against each of the mailing addresses to determine whether said mailing address are available for DDU discounting.

14. (Original)   The process of claim 13 further comprising the steps of eliminating duplicates in the identification codes, wherein two or more duplicate identification codes identify the same eligible USPS postal facility.